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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91212231
Party	Plaintiff Dragon Bleu (SARL)
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Submission	Motion to Join/Substitute Party
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Date	12/27/2015
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

DRAGON BLEU (SARL),

Opposer and Counterclaim
Respondent,

v.

VENM, LLC,

Applicant and Counterclaim
Petitioner.

Opposition No. 91212231

Application Serial No. 85/848,528

OPPOSER'S MOTION TO JOIN PARTY

Dragon Bleu (SARL), Opposer and Counterclaim Respondent ("Opposer"), through its undersigned attorneys, Saunders & Silverstein LLP, hereby moves pursuant to TBMP § 512.01, to join a party as Opposer and Counterclaim respondent. Opposer states as follows:

1. Dragon Bleu (SARL) filed the instant opposition proceeding on August 29, 2013.
2. Dragon Bleu's trademark records upon which the opposition is based, and some of which are subject to Venm LLC's counterclaim, were assigned to VTEC Limited on January 10, 2014.
3. The subject records are based on International Registrations and the assignments were processed through the World Intellectual Property Organization's International Bureau.
4. The current United States Patent and Trademark Office Trademark Status and Document Retrieval (TSDR) page shows the current owner of the relevant registrations as VTEC Limited.

Memorandum of Law

TBMP § 512.01 prescribes that when the trademark records of a plaintiff in an *inter partes* proceeding are assigned to a third party after the commencement of the proceeding it is proper to join the assignee as a co-plaintiff in the proceeding. *See Pro-Cuts v. Schilz-Price Enterprises Inc.*, 27 USPQ2d 1224, 1225 (TTAB 1993) (motion to substitute filed during testimony period granted to the

extent that successor was joined).

In the instant proceeding, the records upon which the opposition is based were assigned from Dragon Bleu (SARL) to VTEC Limited after the filing of the Notice of Opposition. Opposer therefore requests that the Board join VTEC Limited as co-plaintiff in the opposition and co-respondent in the counterclaim and accordingly revise the proceeding caption.

Opposer requests that its motion be granted and that VTEC Limited is joined as a party.

Respectfully submitted,

DRAGON BLEU (SARL)

By its attorneys,



Dated: December 27, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2015, this **Opposer's Motion To Join Party** was served on Applicant by delivering a true and correct copy thereof to Applicant by United States Postal Service, postage pre-paid, via first class mail, addressed to:

Mr. Roger Moore
Venm, LLC
15916 King Street
Overland Park, Kansas 66221
UNITED STATES

A handwritten signature in black ink, appearing to read 'Aaron Silverstein', written in a cursive style.

Aaron Silverstein